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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:23-CR-00143-RFB-BNW

Plaintiff,

vs.

SHAWN CONE

Defendant.

**MOTION FOR LEAVE TO FILE
EXHIBIT TO DEFENDANT
CONE'S SENTENCING
MEMORANDUM UNDER SEAL**

Mr. Shawn Cone by and through his attorney of record, NICHOLAS WOOLDRIDGE, ESQ., and moves this Honorable Court for an Order allowing him to file his Exhibits to his Sentencing Memorandum under seal pursuant to LR 10-5 and Rule 49.1(d) of the Federal Rules of Criminal Procedure.

DATED this 7th day of May, 2024.

/s/ Nicholas Woodridge

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PROCEDURAL HISTORY

Mr. Cone seeks to seal the attached Exhibit to his Sentencing Memorandum to protect his personal medical documentation. Mr. Cone submits the attached exhibits are necessary to be submitted under seal and are not submitted under seal for any improper purpose *See, Cardenas-Ornelas v. Baker, et. al.*, 3:17-cv-00461-MMD-CBC (citing *Demaree v. Pederson*, 887 F.3d 870, 884 (9th Cir. 2018) (quoting *Kamakana v. City and County of Honolulu*, 447 F.3d 1172, 1179 (9th Cir. 2006)) (pleadings should not be a vehicle for improper purposes).

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CONCLUSION

Because sealing the exhibit in support of the Sentencing Memorandum will protect Mr. Cone's protected medical information, this Court should grant an Order permitting him to file the attached Exhibit to the Sentencing Memorandum under seal.

DATED this 7th day of May, 2024.

/s/ Nicholas Woodridge

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IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

May 13, 2024

DATED: _____

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of May, 2024, I served a copy of the foregoing **Motion for Leave to File Defendant Cone's Exhibits to the Sentencing Memorandum Under Seal** by U.S. District Court CM/ECF Electronic Filing, to:

Jacob.operskalski@usdoj.gov

/s/ Melody Phommaly
An employee of Wooldridge Law

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